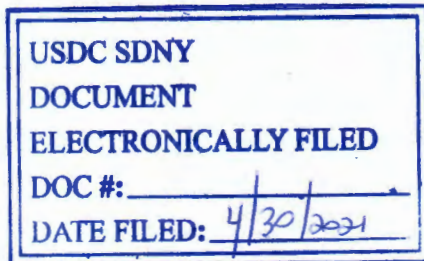


HAND BALDACHIN ASSOCIATES LLP

LAW OFFICES

1740 Broadway
15th Floor
New York, NY 10019

dir 212.956.9508
tel 212.956.9500
fax 212.376.6080
amichaels@hballp.com



April 29, 2021

VIA ECF

Hon. Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

4/29/2021
OK - I will
set a new date
if I don't know
✓

Re: *Common Cents Distributors, LLC v. CURLS Beauty Brands, LLC*
1:20-cv-10369-CM

Dear Judge McMahon:

MEMO ENDORSED

This firm represents defendant CURLS Beauty Brand, LLC (sued as CURLS Beauty Brands, LLC) ("CURLS").

This is a request for an adjournment of the initial pretrial conference scheduled for April 30, 2021. CURLS, with the consent of the Plaintiff, respectfully requests the conference be adjourned *sine die* pending the Court's ruling on CURLS's Rule 12(b)(2) motion to dismiss for lack of personal jurisdiction.

CURLS filed its motion on April 26, 2021 and, under the Local Civil Rule 6.1, briefing will be complete by May 17, 2021. Given that CURLS's motion is potentially dispositive of the entire case, it is CURLS's belief that adjournment of the pretrial conference until after the personal jurisdiction issues are resolved is the more prudent approach.

No extension of this deadline has previously been requested or granted. No other dates have been set in this matter and the requested extension will neither affect nor disrupt any other deadlines in this matter.

H A N D B A L D A C H I N A S S O C I A T E S L L P

Hon. Colleen McMahon
April 29, 2021
Page 2

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Adam B. Michaels", with a long horizontal flourish extending to the right.

Adam B. Michaels

cc: All counsel of record (via ECF)